# STATE OF SOUTH CAROLINA

### BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2017-370-E

In Re:	) ) )	
Joint Application and Petition of South	)	
Carolina Electric & Gas Company and	)	
Dominion Energy, Incorporated for Review	)	
and Approval of a Proposed Business	)	
Combination between SCANA Corporation	)	PETITION TO INTERVENE
and Dominion Energy, Incorporated, as May	)	
Be Required, and for a Prudency	)	
Determination Regarding the Abandonment	)	
of the V.C. Summer Units 2 & 3 Project and	)	
Associated Customer Benefits and Cost	)	
Recovery Plan	)	
	)	

The South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE") hereby petition the Public Service Commission of South Carolina ("Commission") to intervene in the above-captioned docket pursuant to R. 103-825 of the Commission's rules. In support of this petition, CCL and SACE state as follows:

- 1. On January 12, 2018, South Carolina Electric & Gas Company ("SCE&G") and Dominion Energy, Inc. filed a Joint Application and Petition, asking the Commission to approve a merger and a "customer benefit and cost recovery plan" for costs associated with V.C. Summer Units 2 & 3, and to issue necessary Base Load Review Act prudence determinations.
- 2. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. CCL promotes the implementation of comprehensive local, state, and federal energy policies related to renewable energy, energy efficiency, and climate change. CCL has members in South

Carolina who receive electricity service from SCE&G and are subject to the impacts of SCE&G's rates.

- 3. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members from across the State, including members who receive electricity service from the SCE&G and will be impacted by the decisions made in this proceeding. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.
- 4. CCL and SACE have participated in numerous prior proceedings related to, among other things, the V.C. Summer nuclear units and SCE&G's resource planning and energy efficiency programs. CCL is already an intervening party in Docket Numbers 2017-207-E and 2017-305-E, which the Commission consolidated with Docket 2017-370-E on January 31, 2018. Order 2018-80. CCL and SACE seek to intervene in this proceeding to ensure that their members' interests in promoting clean energy resources for customer bill relief are represented.
- 5. If allowed to intervene, CCL and SACE will advocate for clean energy solutions that provide bill relief for SCE&G customers. CCL and SACE have not otherwise formulated their position in this proceeding. CCL and SACE plan to present their position in comments or prefiled testimony, as specified by the Commission.
  - 6. CCL and SACE are represented by the following counsel in this proceeding:
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WHEREFORE, CCL and SACE pray that they be allowed to intervene in this matter.

Respectfully submitted this 22<sup>nd</sup> day of February, 2018.

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# STATE OF SOUTH CAROLINA

# BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2017-370-E

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plan  CERTIFICATE OF SERVICE  CERTIFICATE OF SERVICE  CERTIFICATE OF SERVICE  ACREA OF SERVICE  DETERMINED  APPLICATE OF SERVICE  CERTIFICATE OF SERVICE  CERTIFICATE OF SERVICE  CERTIFICATE OF SERVICE  ACREA OF SERVICE  CERTIFICATE OF	In Re:	) ) )
Dominion Energy, Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost CERTIFICATE OF SERVICE CERTIFICATE	Joint Application and Petition of South	)
and Approval of a Proposed Business ) CERTIFICATE OF SERVICE Combination between SCANA Corporation ) and Dominion Energy, Incorporated, as May ) Be Required, and for a Prudency ) Determination Regarding the Abandonment ) of the V.C. Summer Units 2 & 3 Project and ) Associated Customer Benefits and Cost )	Carolina Electric & Gas Company and	)
Combination between SCANA Corporation ) and Dominion Energy, Incorporated, as May ) Be Required, and for a Prudency ) Determination Regarding the Abandonment ) of the V.C. Summer Units 2 & 3 Project and ) Associated Customer Benefits and Cost )	Dominion Energy, Incorporated for Review	)
and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost )	and Approval of a Proposed Business	) CERTIFICATE OF SERVICE
Be Required, and for a Prudency ) Determination Regarding the Abandonment ) of the V.C. Summer Units 2 & 3 Project and ) Associated Customer Benefits and Cost )	Combination between SCANA Corporation	)
Determination Regarding the Abandonment ) of the V.C. Summer Units 2 & 3 Project and ) Associated Customer Benefits and Cost )	and Dominion Energy, Incorporated, as May	)
of the V.C. Summer Units 2 & 3 Project and ) Associated Customer Benefits and Cost )	Be Required, and for a Prudency	)
Associated Customer Benefits and Cost )	Determination Regarding the Abandonment	)
,	of the V.C. Summer Units 2 & 3 Project and	)
Recovery Plan )	Associated Customer Benefits and Cost	)
	Recovery Plan	)

I certify that the following persons have been served with one (1) copy of the foregoing

Petition to Intervene by electronic mail and/or U.S. First Class Mail at the addresses set forth

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This  $22^{nd}$  day of February, 2018.

s/ Anna M. Crowder